

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
v.

Case No. 2:18-cr-20030-AC-DRG
Hon. Avern Cohn

D-1 JOSEPH DELFGAUW,
Defendant.

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PETITION TO AMEND ORDER
SETTING CONDITIONS OF RELEASE (DOC #7)

1. Defendant was arraigned on April 18, 2018.
2. Prior to Defendant's arraignment, Defendant was interviewed by Pretrial Services.
3. Defendant informed Pretrial Services he has twin daughters who reside in Canada. Defendant has an enhanced driver's license to allow him to travel to Canada to see his daughters. Pretrial Services stated they will not require Defendant to surrender his enhanced driver's license, but the Court must approve travel to Canada.
4. Judge Grand approved Defendant's unrestricted travel to Ontario, Canada as a condition of release. Judge Grand further ordered that Pretrial Services would coordinate the notice or other requirements for Defendant to travel to Canada.

5. The Order Setting Conditions of Release (Doc #7) paragraph 7(g) restricts Defendant to the continental United States unless consent of Pretrial Services.
6. After the arraignment, Pretrial Services stated they will not allow Defendant to travel to Canada unless the Court orders it.
7. Pretrial Services further indicated a Petition would have to be filed to amend paragraph 7(g) to include Ontario, Canada.
8. The U.S. Attorneys' office is aware of this request and did not object to Defendant being allowed to travel to Canada to visit his daughters and placed this on the record on April 18, 2018 during Defendant's arraignment.

Wherefore, Defendant requests this Court to amend Doc #7, paragraph 7(g) to include travel within the continental United States and Ontario, Canada.

Respectfully Submitted
ERIC A. LADASZ, P.C.

By: /s/ Eric Ladasz
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Dated: May 5, 2018

CERTIFICATE OF SERVICE

I, Eric Ladasz, certify that on May 5, 2018 I served a copy of a Petition to Amend Order Setting Conditions of Release (Doc #7) and this Certificate of Service on all attorneys of record with the Court by using the ECF system.

By: /s/ Eric Ladasz
Eric Ladasz